

1 THE HONORABLE BARBARA J. ROTHSTEIN  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CASSAUNDRA MAXWELL, individually  
and on behalf of all others similarly situated,

Plaintiff,

vs.

AMAZON.COM, INC., a Delaware  
corporation, and AMAZON ADVERTISING,  
LLC, a Delaware limited liability company,

Defendants.

No. 2:25-cv-00261-BJR

JOINT MOTION AND [PROPOSED]  
ORDER TO EXTEND DEFENDANTS'  
DEADLINE TO RESPOND TO  
COMPLAINT

Plaintiff Cassaundra Maxwell (“Plaintiff”) and defendants Amazon.com, Inc. and Amazon Advertising, LLC (“Defendants”), by and through their undersigned counsel, hereby respectfully move this Court to enter an Order extending the deadline for Defendants’ response to Plaintiff’s Complaint by forty-five (45) days, up to and including April 21, 2025. The undersigned certify that the parties met and conferred prior to filing this Motion, per Paragraph C of the Court’s Standing Order for All Cases. As set forth below, good cause exists for the parties’ requested extension.

1       1. Plaintiff filed the Complaint in this matter on February 10, 2025 and served the  
2 Complaint on Defendants on February 14, 2025. Thus, Defendants' deadline to respond to the  
3 Complaint is March 7, 2025.

4       2. Defendants only recently retained undersigned counsel, and undersigned counsel  
5 have begun to investigate the allegations in the Complaint.

6       3. Given the complexity of the legal claims and factual matters at issue in the  
7 Complaint – including the technical features of Amazon's software development kit, the  
8 mechanics of Amazon's advertising network, and the online advertising industry at large –  
9 Defendants' initial investigation is ongoing and will require an extension of time beyond  
10 March 7, 2025 in order for Defendants to adequately respond to the Complaint.

11       4. In addition, Defendants' investigation thus far has revealed certain factual issues  
12 that the parties would benefit from discussing thoroughly before any responsive pleadings or  
13 motions are filed. Defendants believe such discussions would be most effective if they take place  
14 after Defendants have completed their initial investigation of Plaintiff's allegations. Such  
15 discussions would be in accordance with Paragraph F of the Court's Standing Order requiring  
16 parties to meet and confer prior to filing a motion to dismiss.

17       5. Furthermore, the Court is currently presiding over another case that Plaintiff has  
18 identified as related to this case: *Albano v. Amazon.com, Inc.*, Case No. 2:25-cv-00252-BJR.  
19 The parties anticipate that some level of coordination as between the two cases may be merited,  
20 and the requested extension will allow the parties sufficient time to discuss the most efficient  
21 way to proceed. Defendants have not yet been served in the *Albano* case.

22       THEREFORE, the parties respectfully request that the Court enter the attached proposed  
23 order extending Defendants' deadline to respond to the Complaint by 45 days to April 21, 2025.

24       A copy of the proposed order will also be sent via email to chambers.  
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1                   Respectfully submitted this 28th day of February 2025.  
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6                   /s/ Nicola Menaldo

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60                  *Attorneys for Defendants Amazon.com, Inc. and Amazon Advertising LLC*  
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63                  JOINT MOTION TO EXTEND DEADLINE  
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65                  (No. 2:25-cv-00261-BJR) – 3

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*Attorneys for Plaintiff Cassaundra Maxwell*

IT IS SO ORDERED.

DATED THIS                    day of March, 2025.

**HONORABLE BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE**